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January 28, 2009

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## VIA HAND DELIVERY

Mr. Jack Gould  
Office of the General Counsel  
Federal Election Commission  
999 E. Street N.W.  
Washington, D.C. 20463

RE: MUR 6054 (Jack Prater and William F. Mullins)

Dear Mr. Gould:

This response is submitted on behalf of Jack Prater and William F. Mullins (collectively "Respondents") in relation to the letters sent by the Federal Election Commission ("FEC") on December 18, 2008 notifying Respondents of a complaint filed by Citizens for Responsibility and Ethics in Washington ("Complaint"). Pursuant to 2 U.S.C. § 437g(a)(1), no action should be taken against Respondents.

### **Statement of Facts**

Jack Prater is currently an employee of 1099 L.C. d/b/a Venice Nissan Dodge and has been an employee since October 1, 2002. William F. Mullins is no longer an employee of 1099 L.C. d/b/a Venice Nissan Dodge as of October 24, 2008. In September of 2005, Respondents each made one \$1,000 contribution to Vern Buchanan for Congress (Committee ID: C00412759).

### **Response**

Respondents deny the allegations contained in the Complaint as it pertains to them. Specifically, Carlo Bell and David Padilla allege in their affidavits that Respondents were reimbursed for contributions to Vern Buchanan for Congress. See Affidavit of Carlo Bell at ¶¶ 5, 6 and 8 and Affidavit of David Padilla at ¶ 6. However, these allegations are directly contradicted by the attached affidavits signed by Respondents. See Exhibits A and B.

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FEDERAL ELECTION  
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COUNSEL

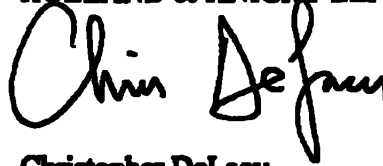
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Based on the foregoing, I request the FEC not take any action in this matter as it relates to Respondents.

Sincerely yours,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read "Chris DeLacy", written over the printed name.

Christopher DeLacy

Enclosures

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